



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 29, 2020

**BY ECF**

The Honorable Claire C. Cecchi  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07101

**Re: *Hana v. United States*, 20 Cv. 536 (CCC)**

Dear Judge Cecchi:

The Government respectfully writes to notify the Court that at approximately 4:00 p.m. yesterday, agents from the Federal Bureau of Investigation (the "FBI") returned to the offices of Larry Lustberg, Esq., and Anne Collart, Esq., counsel to the Plaintiff, copies of all physical documents seized during searches of the Plaintiff's home and office, the Plaintiff's passport, and jewelry and currency seized from the Plaintiff's home.

The FBI also had intended to deliver an external hard drive containing electronic images of those devices seized from the Plaintiff's home and office that the FBI had successfully accessed and imaged. Due to a disruption in the FBI's network that occurred this past weekend, however, the device images failed to upload to the hard drive. The FBI is in the process of re-uploading the device images to the hard drive and plans to deliver the drive to Mr. Lustberg and Ms. Collart this Friday, January 31, 2020. The Government will notify the Court once the hard drive has been delivered.

Respectfully submitted,  
GEOFFREY S. BERMAN  
United States Attorney

By: /s/  
Gillian Grossman / Jason Richman  
Assistant United States Attorneys  
(212) 637-2188 / 2589

cc: Larry Lustberg, Esq. and Anne Collart, Esq. (by ECF)